

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors,	§	
and	§	
	§	
STATE OF NEW JERSEY	§	
	§	
Defendant-Intervenor.	§	

**DEFENDANT-INTERVENORS’ UNOPPOSED MOTION FOR LEAVE TO  
EXCEED PAGE LIMITS ON THEIR BRIEF IN OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT**

Defendant-Intervenors Karla Perez, et al. (“Defendant-Intervenors”) respectfully request that the Court grant permission to exceed the 20-page limit by 30 pages in their Brief in Opposition to Plaintiff’s Motion for Summary Judgment. Defendant-Intervenors request these additional pages in order to present their arguments to the Court regarding the complex and significant issues presented in Plaintiffs’ motion. Defendant-Intervenors seek this extension for good cause and in the interests of justice, not for delay, and no party will be prejudiced if the extension is granted. Plaintiffs made a request to exceed the 20-page limit by 27 pages for their brief in support of their motion for summary judgment, *see* Dkt. 485, which Defendant-Intervenors did not oppose.

Plaintiffs noted this motion “raises complex issues in a case of national importance” and that the extra pages were needed to “adequately present these issues.” *Id.* The Court granted this request. *See* Dkt. 488.

The Plaintiffs, Defendants, and the State of New Jersey as Defendant-Intervenor do not oppose Defendant-Intervenors’ request.

### **CONCLUSION**

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant Defendant-Intervenors’ Unopposed Motion for Leave to Exceed Page Limits.

Dated: November 5, 2020

Respectfully Submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

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**CERTIFICATE OF CONFERENCE**

I certify that on November 5, 2020, I emailed counsel for all parties regarding the relief requested in this motion. Counsel for Plaintiffs, Defendants, and the State of New Jersey each indicated that they do not oppose this motion.

/s/ Nina Perales  
Nina Perales

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on November 5, 2020, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales  
Nina Perales

